

CONZALOS GLASSO

Plaintiff

V.

Superintendent Hanks, Major Elliot,  
Captain Conyers, Captain Gilley,  
Captain Stoneberger, Lieutenant Watson,  
Sgt. Kraus, Nurse Hoover  
Psychiatric Doctor Lavina  
Grievances Specialist Seife  
Officer S. Mays, Officer J. Moore  
Officer C. Bacote, [REDACTED]

Cause No. #

2013 FEB 22 PM 3:52

 U.S. DISTRICT COURT  
 SOUTHERN DISTRICT OF INDIANA  
 LAUREL B. BRADY  
 CLERK
**1:13-cv-0303 RLY-MJD**

1:13-cv-787-TWP-DML

AND

1:13-cv-788-WTL-DKL

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FEB 22 2013

 U.S. CLERK'S OFFICE  
 INDIANAPOLIS, INDIANA

Civil Right Complaint  
Under 42, U.S.C. 1983
1. Introduction

This is a Civil Right Action brought by a State Prisoner Under 42, U.S.C. 1983 for damages a declaratory Judgement and injunction, I Alleged that defendants displayed deliberate indifference to Plaintiff safety and health in violation of the Eight Amendment of the United States Constitution, by jeopardizing the safety of my health subjecting me to unnecessary and wounding infliction on mental stress, emotional and psychological.

2. Parties

- ① My name Conzalos Glasso and I'm incarcerated at Pendleton Correction Facility, 4490 W. Reformatory Road, Pendleton, IN 46064
- ② Defendant Superintendent Hanks, is, or was a super intendent at P.C.F. he ~~is~~ <sup>is sued</sup> in his individual capacity for damages.
- ③ Defendant Major Elliot, is, or was a Major at P.C.F. she is sued in her individual capacity for damages.
- ④ Defendant Captain Conyers, is, or was a captain at P.C.F. he is sued in his individual capacity for damages.
- ⑤ Defendant Captain Stoneberger, is, or was a captain at P.C.F. he is sued in his individual capacity for damages.
- ⑥ Defendant Captain Gilley, is, or was a captain at P.C.F. he is sued in his individual capacity for damages.
- ⑦ Defendant Lieutenant Watson is, or was a Lieutenant at P.C.F. he is sued in his individual capacity for damages.
- ⑧ Defendant (Sgt Kraus), is, or was a Sgt At P.C.F. he ~~is~~ <sup>is sued</sup> in his individual capacity for damages.

①.

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① Defendant Nurse, is, or was a nurse at P.C.F. she is sued in her individual capacity for damages.

② Defendant S. Mays, is, or was a correctional officer at P.C.F. she is sued in her individual capacity for damages.

③ Defendant J. Moore, is, or was a correctional officer at P.C.F. she is sued in her individual capacity for damages.

④ Defendant C. Bacote, is, or was a correctional officer at P.C.F. he is sued in his individual capacity for damages.

⑤ Defendant grievance specialist ~~seate~~, is, or was a grievance specialist at P.C.F. he is sued in his individual capacity for damages.

⑥ Defendant Doctor Laving, is or was a psychiatrist at P.C.F. he is sued in his individual capacity for damages.

### Grievance Procedure

Plaintiff submitted numerous informal grievance about all his claims, prisoner Correction Facility cover up these violations, refuse to file plaintiff grievance see the attached informal evidence P.C.F. custody destroy plaintiff grievances. Lewis v. Washington, 300, F. 3d 829, 7th Cir. 2002).

### Nature of Case

Defendants Motive, was to put the Plaintiff safety of his life and health in danger, due to Plaintiff being listed as a (Sex Offender) by telling other inmates Plaintiff is a (Child molester, Rapist) passing Plaintiff identification to other inmates. So these inmates could take Plaintiff identification and look and see what Plaintiff was arrested for and putting (feces) in Plaintiff food telling Plaintiff to eat that food with (feces) in it, and scraping Plaintiff skin with handcuffs, numerous of times (Intent). And these defendants having a hostile attitude toward Plaintiff at all times.

### Cause of Action

I Alleged that the following of constitution rights privilege immunities have been violated and that the following facts form the basis of Allegations:

Claim ones The defendants was in form of these matters and they disregarded these matters, by jeopardizing my safety and health, putting my safety and health in danger causing, severe mental stress.

If (The official knows of and disregards and excessive risk to inmates health and safety). Farmer v. Brennan, 511, U.S. 825, 833, 125, L. Ed 2d 811

114, S. Ct. 1970, (1994). (2) OFFICIAL CAN BE FOUND RECKLESS OR DELIBERATELY DIFFERENT

Claim two: Defendant Serving Plaintiff food with (feces) in it  
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Nicholson v. Choctaw County - AIA: 498 F. Supp. 295, 313, S.D.  
ALA: 1980), No Meat from an animal Killed on the highway or  
Road - - - Shall be Serve in the Jail, Light foot v. Walker,

486, F. Supp. 504, 512-13, 524 S.D. Ill. 1980)  
Food is one of the basic necessities of life protected by the Eight Amendment.

### Cause of Action with Supporting facts

At All times relevant to this complaint, the defendant, while acting under the color of State law, deprived Plaintiff, of his Eight Amendment Rights to the United States of America while a reasonable person would have know.

① On November 3, 2012 at Pendleton Correction Facility - R-Cellhouse - Range - 3 - Cell - 1 Defendant S. Mays, started verbally abusing Plaintiff, calling Plaintiff a (Child Molester Rapist) and other UNL gasittes, this began because Plaintiff confronted Defendant S. Mays, about scraping his skin with handcuffs. Defendant S. Mays, started hollering out loud (Plaintiff is a Child Molester, Rapist,) so other inmates could hear her because of this belief Defendant S. Mays, would verbally abuse Plaintiff with the handcuffs scraping Plaintiff, skin on his wrist each time she handcuff Plaintiff, Plaintiff had to start putting medical request slip for his skin being scrape from handcuffs, on 12-19-12 Defendant S. Mays, passing Plaintiff, identification to other inmates so these inmates could take Plaintiff identification and look to see what Plaintiff was affected for, Several inmates have threatened to kill Plaintiff if they ever get a chance. Because of what Defendant S. Mays, have told these inmates about Plaintiff The verbally abuse continues by Defendant S. Mays, Defendant S. Mays, kept writing UNLAWFUL conduct reports against Plaintiff to Retaliated against Plaintiff from Plaintiff Law suit.

② ON 11-27-12 Defendant C. Bacote (A) started telling Plaintiff, to (suck his Nutts.) This started because Plaintiff Ask Defendant C. Bacote, for (3) request Slips. (B) 12-2-12 Defendant C. Bacote, And Defendant J. Moore, took Plaintiff, sweat Pant and Shirt for harassment purposes, Defendant C. Bacote, and Defendant J. Moore, told the other Defendants Plaintiff, will never see his Sweat Pants and shirt. The Verbal Abuse continues by Defendant C. Bacote, (C) on 12-16-12 Defendant C. Bacote, began calling Plaintiff a punk, telling Plaintiff to shut up and Plaintiff can not read or write and telling the inmates plaintiff eyes are crooked, Pendleton correction facility, high ranking Defendants keep giving Defendant C. Bacote, another opportunity to put (feces) in Plaintiff's food again, P.C.F. continues right now having Defendant C. Bacote to bring Plaintiff food to him, Plaintiff, Scared to eat his food After

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- 2) What Defendant C. Bacote did to plaintiff food, plaintiff requested over and over to have another officer to bring plaintiff food all request denied. Plaintiff continues to be scared, scared to eat his food) (D) on 12-30-12 right after Nurse Wallen gave Plaintiff his Medicine, Defendant J. Moore, escorted plaintiff to Medical, while being escorted to Medical, Defendant C. Bacote kept calling Plaintiff, Bitches, punks, and telling Plaintiff to (Suck his Nuts) Review witness statement) doing this verbally abuse Plaintiff overheard Defendant C. Bacote, call Plaintiff (Child Molester)
- 3) Defendant J. Moore, would encourage Defendant C. Bacote, to harass Plaintiff, telling him to call Plaintiff, Bitches, punks, and that Plaintiff cannot read or write. Also, encouraging Defendant C. Bacote, to put (Feces) in Plaintiff food. Defendant J. Moore, threatened AN inmate, stated to this inmate. (He better not get caught talking to Plaintiff.) (Review A. Kraus witness statement)
- 4) On January 29, 2013 at P.C.F Defendant Watson, encouraged Defendant ~~Kras~~ Defendant Hoover, to Retaliate against Plaintiff, By using excessive force against Plaintiff holding Plaintiff down while Defendant Hoover, take syringe and shoot Medicine in Plaintiff butt area. This happen to Plaintiff, because Plaintiff has a law suit pending against P.C.F staff Members. Instead of admitting the true, these three defendants lie stating Plaintiff is crazy and need Medicine, but Plaintiff never been on mental Medicine.
- 5) Defendant Superintendent Hanks, encouraging these defendants to harass plaintiff by ignoring these serious matters, after having a conversation with Defendant Hanks on November 30, 2012 About these Defendants verbally Abusing, continue harassing plaintiff and Nothings done About it, and Nothing was done about Defendant C. Bacote including Defendant J. Moore, putting (Feces) in plaintiff food. Defendant Superintendent Hanks, continue doing Nothing About the harassment Against plaintiff.
- 6) Defendant Major Elliot, encouraging these defendants to harass plaintiff after having a conversation with Defendant Elliot, About these defendants harassing plaintiff, Defendant Elliot is aware of this harassment by each and every Defendants, and Defendant Elliot continues doing Nothing About this harassment.
- 7) Defendant Lead Captain Conyers, encouraging these Defendants to continue the harassment against the plaintiff, After having a conversation with defendant conyers, About defendant S. Mays, Defendant J. Moore, Defendant C. Bacote, harassing the plaintiff and giving the defendant a chance to put (Feces) in plaintiff food again Defendant conyers told plaintiff we will continue harassing plaintiff, and Nothings going to be done About it.
- 8) Defendant Captain Gilley, encouraging these defendants by covering up this File Act, After having A conversation with Defendant Gilley, Requested through Defendant Gilley to examine Plaintiff food, check-out (through) Defendant Gilley told plaintiff they will not examine plaintiff food. (you eat it) or (don't eat it) Also telling plaintiff, Defendant S. Mays, Defendant J. Moore, Defendant C. Bacote, will continue harassing plaintiff anyway they can.

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8.) Defendant captain Stonebarger, encouraging defendant C. Bacote to put (Cecce's) in plaintiff food again I inform defendant Stonebarger, I fear, scared to eat my food cause defendant C. Bacote, continues bringing me my food, and defendant C. Bacote, defendant J. Moore is responsible for (Cecce's) in plaintiff food. Defendant Stonebarger, stated these defendants will continue having an opportunity to put (Cecce's) in plaintiff food.

9.) Defendant doctor lavine on 1-10-13 was questioning the plaintiff about defendants harassing plaintiff, plaintiff was very specific explaining to defendant doctor lavine about these defendant harassing plaintiff, defendant doctor lavine ignore the facts about defendant harassing plaintiff defendant doctor lavine attempted to cover up this harassing stating to plaintiff, plaintiff did not know what he's talking about and plaintiff was crazy defendant doctor lavine threatened plaintiff, stating they will put plaintiff on medication and will use force to give plaintiff medicine.

10.) Defendant grievance specialist scate, on December 7, 2012 I had a conversation with defendant scate, I ask defendant grievance specialist scate, when will I get a response from my grievance file against defendant S. Mays on 11-5-12, 11-3-12 incident defendant grievance specialist scate stated defendant S. Mays did not do anything wrong and defendant grievance specialist scate walk away about the second week of January 2013, I had another conversation with defendant grievance specialist scate, I ask defendant grievance specialist scate, when will I receive a response from informal grievance file against defendant C. Bacote, on 11-30-12, 11-27-12 incident and when will I receive a response from informal grievance file against defendant J. Moore, on 12-5-12 incident and I still have not yet receive a response from informal grievance file against defendant S. Mays 11-3-12 incident defendant grievance specialist scate, stated, do not send him anymore grievance or nothing anymore.

11.) Circumstance described in paragraph (2) through (10) injured plaintiffs liberty and causing him extreme mental, emotional, and psychological injury.

### Conclusion

I pray that the court will grant me the following relief.

- 12.) I seek compensatory damages in an amount to be determined by jury.
- 13.) Because defendant deliberated, violated my constitutional right, I seek punitive damages in an amount to be determined by jury.
- 14.) I seek a declaratory judgement declaring that the defendants actions are unconstitutional.
- 15.) I seek all cost of bringing and enlightening this action.
- 16.) I ask the court for any other relief it deems just, proper and equitable that promises.

### Verification

Respectfully Submitted  
CONZALOS GLASCO  
Arrested 890756th  
Pendleton Correctional Facility  
4490 W. Reformatory Rd.  
Pendleton, IN 46064

Im Conzalos Glasco I affirm under penalty of perjury that the foregoing representation are within my personal knowledge and are true.